

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION (ST. LOUIS)**

PATRICK HURD,
Plaintiff,

CASE NO.

vs.

EXPERIAN INFORMATION SOLUTIONS,
INC.; EQUIFAX INFORMATION
SERVICES, LLC; TRANS UNION, LLC;
RESURGENT CAPITAL SERVICES, L.P.;
CACH LLC; LVNV FUNDING, LLC;
US BANCORP; and STATE FARM
GENERAL INSURANCE CO dba STATE
FARM BANK;
Defendants.

TRANS UNION, LLC’S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC (“Trans Union”) hereby removes the subject action from the Circuit Court of St. Charles County, Missouri, Associate Circuit Division, to the United States District Court for the Eastern District of Missouri (Eastern Division), on the following grounds:

1. Plaintiff Patrick Hurd served Trans Union on or about November 2, 2017, with a Summons and Complaint filed in the Circuit Court of St. Charles County, Missouri, Associate Circuit Division. Copies of the Summons and Complaint as well as the remainder of the State Court file are attached hereto as **Exhibit A**. No other process, pleadings or orders have been served on Trans Union.

2. Plaintiff makes claims under, alleges that Trans Union violated and alleges that Trans Union is liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the “FCRA”). See Complaint ¶¶ 35-48.

3. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

4. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the Circuit Court of St. Charles County, Missouri, Associate Circuit Division, to the United States District Court for the Eastern District of Missouri (Eastern Division).

5. Counsel for Trans Union has confirmed with the Circuit Court of St. Charles County, Missouri, Associate Circuit Division, online, that there is no document or file suggesting any other Defendant has been served. To the best of Trans Union’s knowledge, no other named Defendant in this matter has been served as of the date and time of this Notice Of Removal.

6. Notice of this removal will promptly be filed with the Circuit Court of St. Charles County, Missouri, Associate Circuit Division and served upon all adverse parties.

WHEREFORE, Defendant Trans Union, LLC, by counsel, removes the subject action from the Circuit Court of St. Charles County, Missouri, Associate Circuit Division to this United States District Court, Eastern District of Missouri (Eastern Division).

Respectfully submitted,

/s/ Robert J. Schuckit

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Counsel for Defendant Trans Union, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been filed electronically on the **6th day of November, 2017**. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing.

None.	
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The undersigned further certifies that a true copy of the foregoing was served on the following parties via First Class, U.S. Mail, postage prepaid, on the **6th day of November, 2017**, properly addressed as follows:

for Plaintiff Patrick Hurd

Matthew P. Cook, Esq.
Cook Law, LLC
2885 Sanford Avenue SW, #42270
Grandville, MI 49418

/s/ Robert J. Schuckit

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